

CROSS-COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF: 42 U.S.C. 1985-1986  
Re: #2:14-CR-00027-NDF-2 (USDC/DWY)

TO: U.S. District Court ("USDC")  
2120 Capitol Ave., 2<sup>nd</sup> Floor  
Cheyenne 82001-3658  
Wyoming, USA

DATE: 7/19/2014 A.D.

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2014 JUL 23 PM 12 06  
STEPHAN HARRIS, CLERK  
CHEYENNE

Comes now, once again, the "United States"  
ex rel. Paul Andrew Mitchell, Citizen of  
Washington State, expressly not a federal  
citizen, and Private Attorney General under  
18 U.S.C. 1964 (Civil RICO), to petition this  
honorable Court for declaratory and injunc-  
tive relief from a conspiracy to deprive this  
Relator of equal protection of laws, being  
routinely violated by named Cross-  
Defendants Nancy D. Freudenenthal,  
Christopher A. Crofts, J. Robert Murray,  
Mark C. Hardee, and Does 1 thru 100.

Primary authority for the instant Cross-  
Complaint is the decision of the Tenth Circuit  
in Martinez v. Wimmer, 771 F.2d 424 (1985),  
which skillfully explains why the Cross-  
Defendants, named above, can be liable  
for declaratory and injunctive relief in  
the instant case.



— PRELIMINARY FACTUAL ALLEGATIONS —

Previously, Mr. Murray attempted to file a MOTION for psychological evaluation of Relator, but said MOTION was never served on Relator while appearing In Propria Persona i.e. "personally" under 28 U.S.C. 1654, not "by counsel".

Moreover, no notice of any hearing on said MOTION was ever served on Relator; and, Relator was never allowed to attend any hearing on said MOTION.

Mr. Hardee, claiming to be "standby Counsel," also failed to serve Relator with said MOTION, nor with any notice of any hearing on said MOTION, and likewise never assisted Relator at any hearing(s) on said MOTION.

Then, Ms. Freudenenthal joined the same conspiracy by attempting to sign an "order" authorizing a psychological evaluation of Relator at FDC SeaTac.

Upon arriving at SeaTac, after 28 discrete moves, Relator was totally surprised to be shown said "order" by one Cynthia Low dba Forensic Psychologist at SeaTac.

Subsequently, Ms. Freudenenthal attempted to declare Relator "not competent to represent himself" and "not competent to assist counsel in his defense," in further violation



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of Relator's fundamental Rights to proceed in Propria Persona, and to due process of Law under the Fifth and Sixth Amendments. See Docket #127.

At a prior hearing on 3/21/2014 Relator had made it abundantly clear that he wished to proceed in Propria Persona; and, he also expressly reserved the right to "change his mind" about formal legal representation i.e. "by counsel" under 28 U.S.C. 1654, instead of "personally".

Dkt. #95

By effectively forcing formal legal representation upon Relator in the manner described above, Freudenenthal, Murray and Hardie conspired to infringe Rights guaranteed to Relator under 28 U.S.C. 1654 and under the Fifth and Sixth Amendments, U.S. Constitution.

Although attorneys at Harris & Harris, P.C. have done an admirable job under conditions described above, in point of Law they cannot legally represent Relator in violation of Section 1654, without his consent.

Absent notice and hearing on Murray's original MOTION, all "orders" consequent upon that MOTION were null and void ab initio, because of the obvious due process violations which preceded them.

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Similarly, at no time did Mr. Hardie ever assist Relator in preparation for, nor during, any interviews with Mr. 2 on at SeaTac. And, quite blatantly, Relator was even arraigned without assistance of Counsel standing next to Relator; Mr. Hardie sat in the public gallery during that arraignment! See Docket #42. Relator demurred — to challenge jurisdiction; and, Mr. Rankin entered a "not guilty" plea, which Relator later withdrew formally: Dkt. #107.

also  
USDC/  
WDWA } In the "criminal" case supra, this Court is not only out-of-order; it is actually proceeding in reverse, due chiefly to two (2) separate Rotella hearings, which Relator survived successfully: Dkt. #57.

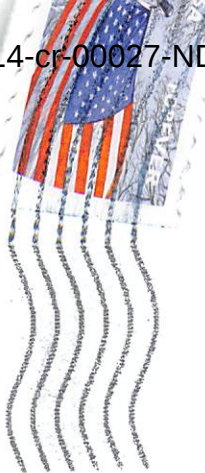
At a minimum, this Court was ousted of jurisdiction of the "criminal" case, pursuant to Johnson v. Zerbst. See Relator's two (2) MOTIONS TO DISMISS, Dkt. #58 and #60.

Relator now incorporates the entire Docket contents supra by reference, as if set forth fully here. QED.

Respectfully submitted without prejudice,  
Paul Andrew Mitchell, B.A., M.S.

Relator In Propria Persona, 28 U.S.C. 1654,  
Private Attorney General, 18 U.S.C. 1964,  
Rotella v. Wood - 4 -





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The Nature of the Content of this Correspondence

LEGAL MAIL

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2120 Capitol Ave., 2nd Floor  
Cheyenne 82001-3658

Re:  
#2:14-CR-00027-NDF-2

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